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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

EUGENE DIVISION

UNITED STATES OF AMERICA,

6:18-cv-02057-MA

Plaintiff,

v.

COMPLAINT

**935 SW 7th Street, Newport, OR,
Lincoln County, State and District of
Oregon, Real Property with Buildings,
Appurtenances, and Improvements, *in rem*,**

Defendant.

Plaintiff, United States of America, by Billy J. Williams, United States Attorney for the District of Oregon, and Amy E. Potter, Assistant United States Attorney, for its Complaint *in rem* for forfeiture, alleges:

COUNT 1

I.

This Court has subject matter jurisdiction, *in rem* jurisdiction, and venue pursuant to

21 U.S.C. § 881; 28 U.S.C. §§ 1345, 1355, 1356, and 1395; and 19 U.S.C. § 1610.

II.

Defendant, *in rem*, 935 SW 7th Street, Newport, OR, Lincoln County, State and District of Oregon, Real Property with Buildings, Appurtenances, and Improvements, (herein after known as “935 SW 7th Street”) and more particularly described as

Lot 10, Block 81, BAYLEY AND CASE’S THIRD ADDITION TO NEWPORT,
Lincoln County, Oregon

is now and during the pendency of this action will be within the jurisdiction of this Court.

III.

Defendant, *in rem*, 935 SW 7th Street, represents property involved in Copyright Infringement in violation of 18 U.S.C. § 2319, and is forfeitable to the United States pursuant to the provisions of 18 U.S.C. § 2323 and 18 U.S.C. § 981(a)(1)(C), as more particularly set forth in the declaration of Keith Druffel, Special Agent, Internal Revenue Service-Criminal Investigations (IRS-CI), marked as Exhibit A, attached and fully incorporated herein by this reference.

COUNT II

IV.

This Court has subject matter jurisdiction, *in rem* jurisdiction, and venue pursuant to 21 U.S.C. § 881; 28 U.S.C. §§ 1345, 1355, 1356, and 1395; and 19 U.S.C. § 1610.

V.

Defendant, *in rem*, 935 SW 7th Street, is now and during the pendency of this action will be within the jurisdiction of this Court.

VI.

Defendant, *in rem*, 935 SW 7th Street, constitutes property, real or personal, involved in a money laundering transaction or attempted transaction or property traceable to money laundering offenses, in violation of 18 U.S.C. § 1957 and is therefore subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A), as more particularly set forth in the declaration of Keith Druffel, Special Agent, IRS-CI marked as Exhibit A, attached and fully incorporated herein by this reference

WHEREFORE, plaintiff, United States of America, prays that due process issue to enforce the forfeiture of 935 SW 7th Street, *in rem*; that due notice be given to all interested persons to appear and show cause why forfeiture of this defendant, *in rem*, should not be decreed; that due proceedings be had thereon; that this defendant be forfeited to the United States; that the Plaintiff United States of America be awarded its costs and disbursements incurred in this action.

DATED: **November 28, 2018.**

Respectfully submitted,

BILLY J. WILLIAMS
United States Attorney

s/ Amy E. Potter
AMY E. POTTER
Assistant United States Attorney

VERIFICATION

I, Keith Druffel, declare under penalty of perjury, pursuant to the provisions of 28 U.S.C. Section 1746, that I am a Special Agent with the Internal Revenue Service-Criminal Investigations and that the foregoing Complaint *in rem* for Forfeiture is made on the basis of information officially furnished and upon the basis of such information the Complaint *in rem* for Forfeiture is true as I verily believe.

s/ Keith Druffel

KEITH DRUFFEL

Special Agent

Internal Revenue Service-Criminal Investigations